

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

The New York Times Company,  
Plaintiff,

Case No. 07cv8046(LAK)

v.

**MOTION TO ADMIT COUNSEL  
PRO HAC VICE**

Neasi-Weber International, LLC,  
Defendant.

Neasi-Weber International, LLC,  
Counterclaimant,

v.

The New York Times Company and  
International Herald Tribune U.S. Inc.,  
Counterdefendants.

FILED  
U.S. DISTRICT COURT  
2007 SEP 27 AM 9:51  
S.D. OF N.Y.


PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, I, Stacy K. Wolery, a member in good standing of the bar of this Court, hereby move for an Order allowing the admission pro hac vice of

Applicant's Name: Cynthia Woollacott  
Firm's Name: Woollacott Jannol, LLP  
Address: 10350 Santa Monica Blvd., # 350  
City/State/Zip: Los Angeles, CA 90025  
Telephone Number: (310) 277-5504  
Fax Number: (310) 552-7552

Cynthia Woollacott is a member in good standing of the Bar of the State of California. There are no pending disciplinary proceedings against Cynthia Woollacott in any State or Federal Court.

Date: September 20, 2007  
New York, New York

Respectfully submitted,

  
Sean A. Moynihan (SM 5129)

628179 \$25 9-27-07

Klein Zelman Rothermel, LLP  
485 Madison Avenue, 15<sup>th</sup> Floor  
New York, New York 10022  
(212) 935-6020  
(212) 753-8101

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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The New York Times Company,  
Plaintiff,

Case No. 07cv8046(LAK)

v.

**AFFIDAVIT OF SEAN A. MOYNIHAN  
IN SUPPORT OF MOTION TO ADMIT  
PRO HAC VICE**

Neasi-Weber International, LLC,

Defendant.

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Neasi-Weber International, LLC,  
Counterclaimant,

v.

The New York Times Company and  
International Herald Tribune U.S. Inc.,  
Counterdefendants.

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State of New York     )  
                                  )  
County of New York    )     ss:

Sean A. Moynihan, being duly sworn, hereby deposes and says as follows:

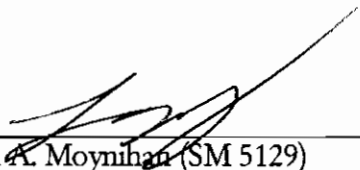
1. I am a partner with the law firm of Klein Zelman Rothermel LLP, counsel for Neasi-Weber International, LLC ("NWI") in the above captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of NWI's motion to admit Cynthia Woollacott as counsel pro hac vice to represent NWI in this matter.
2. I am a member in good standing of the bar of the State of New York, and was admitted to practice law in October 1989. I am also admitted to the bar of the United States District Court for the Southern District of New York, and am in good standing with this Court.
3. I have known Cynthia Woollacott since 2006.
4. Ms. Woollacott is a partner at Woollacott Jannol LLP, in Los Angeles, California.
5. I have found Ms. Woollacott to be a skilled attorney and a person of integrity. She is experienced in Federal practice and is familiar with the Federal Rules of Procedure.
6. Accordingly, I am pleased to move the admission of Cynthia Woollacott, pro hac vice.

7. I respectfully submit a proposed order granting the admission of Cynthia Woollacott, pro hac vice, which is attached hereto as Exhibit A.


WHEREFORE it is respectfully requested that the motion to admit Cynthia Woollacott, pro hac vice, to represent Neasi-Weber International, LLC in the above captioned matter, be granted.

Dated: September 20, 2007  
New York, New York

Respectfully submitted,

  
Sean A. Moynihan (SM 5129)

Sworn to before me on  
this 2<sup>nd</sup> day of September, 2007.

  
Notary Public

**DANA CHARLTON**  
**Notary Public, State of New York**  
**No. 01CH4512786**  
**Qualified in Bronx County**  
**Commission Expires November 30, 20** 09

## **EXHIBIT A**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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The New York Times Company,  
Plaintiff,

Case No. 07cv8046(LAK)

v.

**ORDER TO ADMIT COUNSEL  
PRO HAC VICE**

Neasi-Weber International, LLC,  
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Upon the motion of Sean A. Moynihan, attorney for Defendant Neasi-Weber International, LLC ("Defendant") and said sponsor attorney's affidavit in support;

**IT IS HEREBY ORDERED** that

Applicant's Name:	Cynthia Woollacott
Firm Name:	Woollacott Jannol LLP
Address:	10350 Santa Monica Blvd. # 350
City/State/Zip:	Los Angeles, CA 90025
Telephone/Fax:	(310) 277-5504 / (310) 552-7552
Email Address:	cw@wjllp.com

is admitted to practice pro hac vice as counsel for Defendant in the above captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. If this action is assigned to the Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF password at [nysd.uscourts.gov](http://nysd.uscourts.gov). Counsel shall forward the pro hac vice fee to the Clerk of the Court.

Dated: September 21, 2007  
New York, New York

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United States District/Magistrate Judge



# THE STATE BAR OF CALIFORNIA

MEMBER SERVICES CENTER

180 HOWARD STREET, SAN FRANCISCO, CALIFORNIA 94105-1639

TELEPHONE: 888-800-3400

September 13, 2007

TO WHOM IT MAY CONCERN:

This is to certify that according to the records of the State Bar, CYNTHIA A.R. WOOLLACOTT, #110119, was admitted to the practice of law in this state by the Supreme Court of California on December 12, 1983; and has been since that date, and is at date hereof, an ACTIVE member of the State Bar of California; and that no recommendation for discipline for professional or other misconduct has ever been made by the Board of Governors or a Disciplinary Board to the Supreme Court of the State of California.

THE STATE BAR OF CALIFORNIA

A handwritten signature in black ink, appearing to read "Kath Lambert".

Kath Lambert  
Custodian of Membership Records



UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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The New York Times Company,  
Plaintiff,

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**AFFIDAVIT OF SERVICE**

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v.

The New York Times Company and  
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STATE OF NEW YORK        )  
                                  ) ss.:  
COUNTY OF NEW YORK    )

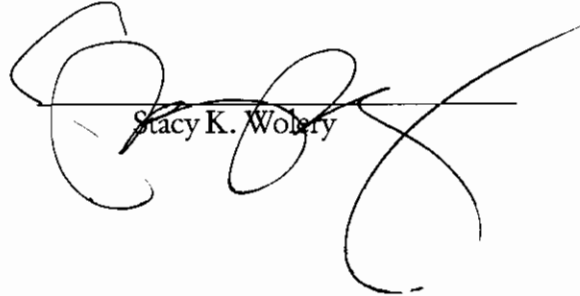
STACY K. WOLERY, being duly sworn says: I am not a party to the action, am over 18 years of age and reside in New York, New York.

On September 21, 2007, I caused to be served a true copy of the Motion to Admit Counsel Pro Hac Vice and the Affidavit in Support of the Motion to Admit Counsel Pro Hac Vice in the following manner.

✓ by mailing the same in a sealed envelope, with postage prepaid thereon, in a post office official depository of the U.S. Postal Service within the State of New York, addressed to the last known address of the addressee(s) as indicated below:

George Freeman, Esq.  
The New York Times Company  
Legal Department  
620 Eighth Avenue, 18<sup>th</sup> Floor  
New York, New York 10018

Ms. Janet L. Robinson  
International Herald Tribune U.S. Inc.  
229 West 43<sup>rd</sup> Street  
New York, New York 10036



Stacy K. Wolery

Sworn to before me this  
21<sup>st</sup> day of September, 2007

  
Notary Public

DANA CHARLTON  
Notary Public, State of New York  
No. 01CH4512786  
Qualified in Bronx County  
Commission Expires November 30, 2009